

1 COOLEY LLP
2 MICHELLE C. DOOLIN (179445) (doolinmc@cooley.com)
3 JENNIFER M. FRENCH (265422) (jfrench@cooley.com)
4 4401 Eastgate Mall
5 San Diego, CA 92121
6 Telephone: (858) 550-6000
7 Facsimile: (858) 550-6420

8 COOLEY LLP
9 BEATRIZ MEJIA (190948) (mejiab@cooley.com)
10 MATTHEW M. BROWN (264817) (brownmm@cooley.com)
11 101 California Street, 5th Floor
12 San Francisco, CA 94111-5800
13 Telephone: (415) 693-2000
14 Facsimile: (415) 693-2222

15 Attorneys for Defendant
16 COLE HAAN

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

STEFANI CONCEPCION, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 11-cv-01826-JSW

JOINT STIPULATION AND [PROPOSED]
ORDER RE PLAINTIFFS' CONSOLIDATED
COMPLAINT

Hon. Jeffrey S. White
Courtroom

Case No. 11-cv-02187-JSW

COORDINATED CASE NO. 11-cv-02187-JSW

JOINT STIPULATION AND [PROPOSED] ORDER RE PLAINTIFFS' CONSOLIDATED COMPLAINT

1
2 Plaintiffs Tammie Davis and Stefani Concepcion (“plaintiffs”) and defendant Cole
3 Haan¹, by and through their respective counsel, jointly submit the following Stipulation to allow
4 plaintiffs to file a consolidated complaint on or before November 14, 2011.

5 **RECITALS**

6 **WHEREAS**, on June 29, 2011, Judge White issued an order coordinating the above-
7 captioned related cases (*Concepcion v. Cole Haan Inc.*, Case No. 11-cv-02187-JSW, ECF No.
8 19); and

9 **WHEREAS**, the parties agree that a consolidated complaint will promote the interests of
10 judicial economy and efficiency;

11 **STIPULATION**

12 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
13 respective counsel of record, that plaintiffs shall file a consolidated complaint on or before
14 November 14, 2011.

15 **IT IS SO STIPULATED.**

17 Dated: October 28, 2011

COOLEY LLP
MICHELLE C. DOOLIN
BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

20 /s/ Beatriz Mejia
21 Beatriz Mejia

22 Attorneys for Defendant
23 COLE HAAN

28 ¹ Cole Haan was erroneously sued as “Cole Haan, Inc.”

1 Dated: October 28, 2011

HARRISON PATTERSON & O'CONNOR LLP
JAMES R. PATTERSON

3 /s/ James R. Patterson

4 James R. Patterson

5 Attorneys for Plaintiff
TAMMIE DAVIS

6 Dated: October 28, 2011

7 STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

9 /s/ Gene J. Stonebarger

10 Gene J. Stonebarger

11 Attorneys for Plaintiff
STEFANI CONCEPCION

12 **FILER'S ATTESTATION**

13 Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that
14 all parties have concurred in the filing of this Stipulation Regarding Deadline to Respond to
15 Complaint.

16 Dated: October 28, 2011

17 COOLEY LLP
18 MICHELLE C. DOOLIN
19 BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

20 /s/ Matthew M. Brown

21 Matthew M. Brown

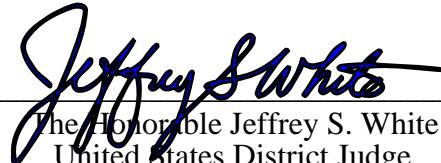
22 Attorneys for Defendant

COLE HANAN

23 The Court DENIES this stipulation without prejudice to refiling. In any amended stipulation, the
24 parties shall address whether the cases should be consolidated for all purposes, or some purposes,
and who shall be acting as lead counsel.

25 **IT IS SO ORDERED.**

26 Dated: October 31, 2011



The Honorable Jeffrey S. White
United States District Judge